

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: St. Charles School

Agency Code: 62-7417

School(s) Reviewed: St. Charles School

Review Date(s): March 7-8, 2018

Date of Exit Conference: March 8, 2018

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Charles School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff and their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the well-being of their students as evidenced by a pleasant atmosphere during meal service, knowing each child by name, an eye-appealing and colorful presentation of food during meal service and through a very clean and organized kitchen.

The DPI review team is confident that St. Charles will continue to improve their knowledge and operation of child nutrition programs. Thank you.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance (TA)/Compliance Reminders

Nine eligibility determinations were reviewed, 2 errors were identified.

Free and Reduced Price Meal Applications

- **Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.**
- Children are **eligible** for free or reduced price meal benefits on **the date their eligibility is determined by the Determining Official.**
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
 - **When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).**
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Carryover policy

- For up to **30 operating days into the new school year** (or until a new eligibility determination is made, whichever comes first) an individual **child's free or reduced price eligibility status from the previous year will continue within the same LEA.**
- **When the carryover period ends, unless the household is notified that their children are directly certified or the household submits an application that is approved, the children's meals must be**

claimed at the paid rate. Though encouraged to do so, the LEA is not required to send a reminder or a notice of expired eligibility

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. **Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of current income.** These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) (IEGs) are used to determine applications, whether manually or electronically (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>). If done through software, please check that the income levels are updated each year after July 1.
- **The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, nor posted on the school bulletin board.** The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).

Household Size Box

- **The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.**

Incomplete Applications

- **Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household.** The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. **The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.**

Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.

- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs **must annually distribute the Public Release to:**
 - **Local news media**
 - **Grassroots organizations** (local organizations providing services to populations in need)
 - **Major employers** contemplating or experiencing large layoffs
 - **Local Unemployment Office** (as applicable)
- **SFAs are not required to pay to have the public release published but must maintain documentation** of whom it was sent to along with the specific materials distributed.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the 'Wisconsinized' version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](#) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Direct Certification

- As a reminder, **you are required to run direct certification a minimum of three times a year:** at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- **The effective eligibility date for a DC eligible student is the date of the original output file.**
- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between

LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review will be required to conduct a second review of applications in the following school year.
- **St. Charles had a 57.1% certification error rate.** More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed during the summer with more information for the SFA.

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** Public release not sent to news media. If there is a charge, SFAs are not required to pay but must have communication of the request to publish with the media. Public release, which includes IEG, cannot be posted on school bulletin board.
Corrective Action Needed: Provide a statement of understanding indicating that St. Charles will attempt to publish the public release with the local media and maintain any communications regarding the attempt and not post public release with IEG on school bulletin board. Public release must go to: media, grassroots organization and major employer or unemployment office, if available.
- ❑ **Finding #2:** Determining Official has not signed and dated free/reduced meal benefit applications on file.
Corrective Action Needed: Provide a statement of understanding of the role and requirements of the Determining official.
- ❑ **Finding #3:** Students approved on an application with reduced status who should have been paid must be changed to appropriate status in the POS and on the BI list.
Corrective Action Needed: Notify the household of the decrease in benefits (due to AR) for students HG and TG. Record these dates of correction on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be figured for these errors for the review period (February) and month of on-site review (March). **Corrected on-site 3-7-2018; no further action required.**
- ❑ **Finding #4:** Students were approved via an application for free meals with incomplete applications—missing Social Security Number and/or Total Household Number.

Corrective Action Needed: Report findings for students MP and BP on the SFA-1. Collect information from the HH and record dates of correction on SFA-1. **Corrected on-site 3-8-18, no further action necessary.** No Fiscal action will be figured for these errors as determination was unchanged.

Verification

Comments/Technical Assistance (TA)/Compliance Reminders

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- **When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days** and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** Verification process did not include required Confirming Official’s review of application(s) selected for verification prior to contacting the household.
Corrective Action Needed: Review the [DPI Verification website](#) and Verification webcasts and submit a summary statement of what the role of the confirming official is and the purpose of the confirmation review (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).
- ❑ **Finding #2:** Verification process did not include validation/proof of all income, as noted on the application(s) chosen for verification.
Corrective Action Needed: Provide a detailed statement of understanding of the verification process.

Meal Counting and Claiming

Comments/Technical Assistance (TA)/Compliance Reminders

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](#) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).
- The meal counting and claim for the month of review was conducted without errors.
- Please note that SFAs may claim visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

MEAL PATTERN AND NUTRITIONAL QUALITY

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

Commendations

Thank you to the staff at St. Charles Grade School for your warm welcome and cooperation throughout the administrative review. Reviewers were impressed with your clean and organized kitchen and we loved seeing all the vegetable offerings on the salad bar!

Comments/Technical Assistance

Meal Pattern Requirements

Week of Review - Breakfast Meal Pattern - Daily Fruit Minimum

1 cup fruit must be offered to students daily. Monday and Tuesday of the week of review only offered 4 fl.oz of juice (1/2 cup fruit).

On-Site Observation - Non-Reimbursable Meals at Breakfast

Two non-reimbursable meals were observed during breakfast meal service. Both meals consisted of 1 cinnamon roll (2 oz eq grain = 1 item), 1 clementine ($\frac{3}{8}$ cup fruit \neq 1 item) and 1 juice ($\frac{1}{2}$ cup fruit = 1 item).

The following list contains the meal pattern requirements for breakfast:

- At breakfast, students must be offered at least four items from the three required components (fruit, grains, and milk. Meat/Meat Alternate items count towards the grain component)
- Under Offer vs. Serve, students must select at least 3 items, one of which is at least a 1/2 cup fruit or vegetable.
- An item is considered a 1/2 cup fruit, 1 oz eq grain or 1 cup of milk

These two meals were considered non-reimbursable for the following reason:

- One clementine does not credit as a 1/2 cup fruit. Therefore, it cannot be considered an item and the two non-reimbursable meals did not have three full items on their tray.

To remedy this, the student would have to take two clementines (which would equal at least a 1/2 cup fruit) to equal one item. Or the student could select another item to create three full items.

Vegetable Subgroups

The meal pattern has five required vegetable subgroups (dark green, red/orange, beans and peas [legumes], starchy, and other) that must be offered over the course of the week. During the week of review, no beans/legumes were offered.

Menu Planning Worksheets

Menu planning worksheets are very helpful tools for ensuring meal pattern requirements are met at both breakfast and lunch (particularly vegetable subgroup requirements).

Use [K-8 Lunch](#) and [K-12 Breakfast](#) menu planning worksheets to verify that your menus and offerings meet meal pattern requirements. Refer to these [instructions](#) for information on how to fill them out. These tools can be found electronically on the [Menu Planning](#) webpage, under the Menu Planning Tools heading (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Whole Grain-Rich (WGR)

All grains offered in school meal programs are required to be whole grain-rich. This means that grain products must be at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched.

The following grain products being used are not WGR: noodles used in Goulash and Mac & Cheese, butter noodles, hamburger bun, sandwich bread, Fruit Whirls cereal, pancake mix and muffins. USDA has a very thorough [Whole Grain Resource](#) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

If St. Charles School can demonstrate a hardship in procuring, preparing or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 23, 2017 memo, "[School Meal Flexibilities for School Year \(SY\) 2017-18](#)" for more information on the exemption process (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf>). Once you have read through the memo, submit a [Whole Grain-Rich Exemption Request](#) with required documentation (<https://docs.google.com/forms/d/e/1FAIpQLSeU2Ib9zEJTHCzwQk1xm0IV7nz8nIKATkLku6tX-Dh3Xijptg/viewform>). Note that until an exemption approval has been received, WGR products must continue to be served.

Additional information is found on the [Meal Pattern Components](#) webpage, under the Grain heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).

50% juice limit

No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. This limit applies separately to breakfast and lunch. Juice offered must be 100%, undiluted juice. For example, ½ cup fruit pieces (fresh, frozen, or canned in juice or light syrup) may be offered alongside ½ cup 100% juice each day, which meets the 50 percent limit.

Dietary Specifications

Second Portions

When second portions of entrée items are offered and students are not charged a la carte prices, their nutritional value must be included in the weekly averages for dietary specifications (calories, saturated fat, and sodium).

Discontinue offering second portions free of charge to students, which complicates production planning; increases food costs; and increases the likelihood meals exceed the dietary

specifications. If students are still hungry, second entrees can be sold a la carte. Side dishes can also be sold a la carte if they meet Smart Snacks standards.

Additionally, offering meat/meat alternate and grains on the salad bar is strongly discouraged. These foods must be taken into account when determining the dietary specifications for the meal. Cheese, cottage cheese and diced ham can be a significant source of calories, saturated fat, and sodium. These items are likely contributing excessive amounts of these nutrients, especially because their usage is not limited. Additionally, these foods also add to the cost of the meal.

Unlimited options

On-site observation of breakfast service and discussion with the Food Service Director revealed that students may take as many breakfast options as they want. This is strongly discouraged due to likelihood that dietary specifications were exceeded. The menu planner has the discretion to limit choices. This will encourage and teach appropriate serving sizes, possibly reduced food waste and food cost and will allow you to stay within the meal pattern requirements.

For example, on Monday during the week of review students could choose cereal, pancakes, sausage and yogurt, in addition to the milk and fruit choice. Instead of allowing students to select every option, limit their choices to stay within the Meal Pattern requirements. It is recommended that students choose between breakfast entree options.

To continue with Monday's example, the menu planner could offer the following choices:

- Cereal or
- Pancakes or
- Yogurt

Note: 2 sausage links only credits as 0.75 oz eq meat/meat alternate. Therefore, to be considered a full item for breakfast, you would have to offer 3 sausage links to credit 1 oz eq meat/meat alternate (which credits towards the grain component at breakfast) which would then meet the daily minimum requirement.

If the menu planner wants to continue to only offer 2 sausage links, it would have to be paired with another breakfast entree option. If this is the case, this would have to be explained thoroughly to anyone serving and determining reimbursable meals.

It was also noted for on-site observation of lunch that many students did not eat the main entree, but instead went back for seconds of their favorite snacks (goldfish crackers, cottage cheese, shredded cheese, etc). Reviewers are confident that by removing and or limiting these meat/meat alternates and grains from the salad bar, students will be more likely to consume the entree of the day.

Crediting Documentation

There must be documentation on site for what products are being served to the students. Due to the limited storage space in your facility, it is understandable that foods were removed from their boxes, however, be sure to take pictures or make copies of the labels of the products in use.

Documentation is necessary to show how the food credits towards the meal pattern. This allows reviewers to verify that the meal pattern daily and weekly minimums and recommended maximums were met.

To credit foods toward the meal pattern you may use one of the following:

-USDA [Food Buying Guide \(FBG\)](#) for School Meal Programs - Use for items that are not processed prior to purchase, such as raw meats, beans, eggs, fruits, vegetables, and milk (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). It is also a useful tool for menu planning, food purchasing, food production, and portioning in the child nutrition programs.

-Product Formulation Statement (PFS) - needed for any processed product that is not listed in the USDA *Food Buying Guide*. A complete PFS must come directly from the manufacturer and must include:

- product name and number
- weights of raw and cooked ingredients
- portion size
- statement of contribution to meal pattern requirements
- original signature signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).
- printed on company letterhead

-Child Nutrition (CN) label - needed for any processed product that is not listed in the USDA *Food Buying Guide*.

If a food item is not found in the FBG or it does not have a valid CN label or PFS, it **may not** be credited when served as part of the USDA School Meal Programs.

Information about crediting documentation can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Standardized Recipes

Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock.

Use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the [Meal Planning](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>).

Reviewers encourage viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

Cycle Menus

Using a cycle menu may ease the burden of menu planning once the cycle has been set and help ensure meal pattern requirements are met after a compliant cycle has been planned (if served as planned). Cycle menus may also aid in purchasing if production records are reviewed and analyzed to forecast meal counts based on historical data.

When using a cycle menu, production records can be partially completed including menu items, crediting information, and serving sizes (potentially planned quantity). Photocopies can be made, or if production records are managed electronically, they can be printed and the remaining information can be completed during production and after meal service.

Additional recipes and resources to meet the required meal pattern can be found as part of the WI SNT [Cycle Menu Resources](#) and on USDA's [What's Cooking?](#) webpages (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>; whatscooking.fns.usda.gov/).

Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. It also aids the menu planner with forecasting, ordering, menu planning, and reducing food waste. Continue to work with all staff members to record serving sizes, planned usage, actual usage, and leftovers.

A list of production record requirements (“[Must Haves and Nice to Haves](#)”), production record templates and additional resources can be found on our [Production Records](#) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Weight vs. Volume on Production Records

Meat/meat alternate (M/MA) is credited by weight, not by volume. Spoodles measure fluid ounces (a volume measure), not ounces by weight. Be cognizant of when production records require serving sizes to be written in volume or weight measures. Staff may weigh the meat/meat alternate, then determine which scoop will hold that weight of meat, this ensures that students are receiving the adequate amount of meat/meat alternate.

Additionally, it is important to remember that the weight of meat/meat alternate and grain products may or may not equal the ounce equivalents (oz eq) that the product contributes towards the meal pattern. Some meat/meat alternates do not credit ounce-for-ounce because they contain ingredients other than meat (e.g. water, fillers, breading). For example, a chicken patty might credit as 1 oz eq but actually weigh 2.25 ounces by weight.

Ounce equivalents can be determined by using the Food Buying Guide, or by referring to a Product Formulation Statement or CN label. Be sure that your serving size matches what the crediting documentation states, if it does not, then staff will need to calculate how a different serving size credits towards the meal pattern.

Here is an example from the week of review: the serving size for Cereal as listed on Production Records is 6 oz. A reviewer will interpret that 6 oz by weight of cereal was offered to students. For comparison, a standard box of Cheerios is approximately 12 oz, which equates to about 9 cups of cereal in each box. This would mean that a 6 oz serving size for breakfast cereal is approximately 4.5 cups! Staff were not serving 6 oz of cereal, but were in fact using a 2/3 cup scoop. This

illustrates the importance to record serving sizes on production records correctly and to remember that weight and volume are different measures.

Printed and Electronic Menus

A separate breakfast menu needs to be created that lists all components included with the reimbursable meal. Currently, only the main entree for breakfast is listed on the Lunch menu.

Non-discrimination Statement

The printed menu has the outdated non-discrimination statement. The following shortened statement should be used: This institution is an equal opportunity provider. A full version can be found on our [Civil Rights Resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

Child and Adult Care Food Program (CACFP)

St. Charles School is Pre-K through grade six. The Pre-K students are comingled at both breakfast and lunch. Due to this, it is not necessary to follow the updated CACFP meal pattern that was implemented on October 1, 2017.

If the Pre-K were to ever be served their meals separately from the other students, they would need to be served the CACFP meal pattern. More information is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Buy American Provision

The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

For any products that are not compliant with the provision (i.e., not domestic) you must have documentation on file that states why the product was not able to be procured/purchased domestically. The documentation must contain the following information:

1. Date
2. Name of Product
3. Country of origin
4. Reason for non-compliance
 - a. Cost analysis
 - b. Seasonality - record the months that the domestic product is not available
 - c. Availability
 - d. Substitution - record the reason the distributor substituted the product
 - e. Distribution - record the reason the distributor carries the non-domestic product
 - f. Other - explain

You may record additional information if you find it beneficial.

DPI has a [tracking template](#) that you may use. It is found on the [Buy American](#) webpage under Buy American Noncomplaint Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Training

Anyone involved with the USDA School Meal Programs is strongly encouraged to attend DPI training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training Page](#) (<https://dpi.wi.gov/school-nutrition/training#up>).

Webcasts, which cover a wide array of topics, are also available online. These can be found on DPI's [Webcast Page](#) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

MEAL PATTERN AND NUTRITIONAL QUALITY CORRECTIVE ACTION

Refer to the comments/technical assistance section for additional detail related to each corrective action item. Submit all meal pattern and nutritional quality corrective action to Hannah.snider@dpi.wi.gov.

1. **FINDING:** During the week of review, only 1/2 cup fruit was offered on Monday and Tuesday. Only a 4 fl.oz juice cup was offered to students. This resulted in a daily fruit shortage, as well as, exceeding the weekly juice limit. At breakfast students must be offered at least 1 cup of fruit daily, and over the course of a week no more than 50% of the fruit offered may be in the form of juice.
CORRECTIVE ACTION REQUIRED: Submit a statement of how you would fix the week of review, and going forward how you will make sure 1 cup of fruit is offered to students. In addition include a statement how you will make sure the 50% juice limit is not exceeded.
2. **FINDING:** Missing Beans/legumes vegetable subgroup during the week of review.
CORRECTIVE ACTION REQUIRED
Complete a [menu planning worksheet](#) for lunch for the week of review, February 5-9th. Include a printed menu with your submission.
3. **FINDING:** Not all grain products served are whole grain-rich. The following products were noted:
 - Noodles used in Goulash and Mac & Cheese
 - Butter Noodles
 - Hamburger bun
 - Sandwich bread used in French Toast
 - Fruit Whirls cereal
 - Pancake mix
 - Muffins

CORRECTIVE ACTION REQUIRED: Find alternative whole grain-rich products to serve. Make copies of the product labels and ingredient lists and submit to hannah.snider@dpi.wi.gov. If there are products that you are unable to get, due to

availability through your distributor or local store, then complete and submit a [Whole Grain-Rich Exemption Request](#) through the DPI website (<https://docs.google.com/forms/d/e/1FAIpQLSeU2Ib9zEJTHCzwQk1xm0IV7nz8nIKATkLku6tX-Dh3Xijptg/viewform>). Please read the instructions and requirements of the exemption request carefully. When you submit the product labels include a statement about whether or not you will apply for an exemption request.

4. **FINDING:** At breakfast, due to the ability of students to select any of the breakfast offerings, the weekly oz eq total (25.5 oz eq) far exceeded the recommended maximum of 10 oz eq grains. Due to this, it is likely that dietary specification of calories, saturated fat and sodium were surpassed.
CORRECTIVE ACTION REQUIRED: Submit a statement that explains what you will do to limit the amount of food students can take at breakfast.

5. **FINDING:** Meat/meat alternate and grains offered on the salad bar with unlimited seconds. Remove or limit the meat/meat alternate (cottage cheese, shredded cheese, eggs, diced meats, bacon bits) and grains (goldfish crackers) from the salad bar. A good variety of beautiful sliced vegetables (tri-colored bell peppers, broccoli, carrots, lettuce etc) are offered daily; it is highly encouraged to highlight those options. By limiting and or removing some or all of the meat/meat alternates and snack-type grains from the salad bar, you will be encouraging students to eat the main entree of the day, rather returning to the salad bar to take more of their favorite snack-type options. To aid in this, remove the meat/meat alternate and grain options from the salad after meal service. Leave the fruits/vegetables out, instead.
CORRECTIVE ACTION REQUIRED: Submit a statement indicating your plan to implement more control over the salad bar. Reduce and/or eliminate the meat/meat alternate and grains from the salad bar.

6. **FINDING:** Insufficient crediting documentation was supplied for the Popcorn Chicken and the cheese sauce (used with Mac & Cheese) during the week of review. A product spec sheet does not contain information on how the product credits towards the meal pattern.
CORRECTIVE ACTION REQUIRED
 - Request from the manufacturer and submit a product formulation statement or Child Nutrition (CN) label for the Popcorn Chicken and the cheese sauce.
 - Note: If submitted documentation for the Popcorn Chicken identifies a daily shortage in grains, then this would be considered a repeat violation and fiscal action would be required.

7. **FINDING:** Production Records were not completely filled in for the week of review. Breakfast and lunch Production Records need to provide the number of meals planned and served, including the number of adult meals; accurate serving sizes (correct weight or volume measurements); proper meal pattern crediting; amount served and leftovers. Salad bar Production Records need planned serving sizes.
CORRECTIVE ACTION REQUIRED: Complete and submit one week (the week of review February 5-9, 2018) of breakfast, lunch and salad bar production records with all required information filled in.

8. **FINDING:** The printed menu has the outdated non-discrimination statement.

CORRECTIVE ACTION REQUIRED: Change the non-discrimination statement on the printed menus to say: This institution is an equal opportunity provider. Submit a copy of the updated menu.

9. **FINDING:** The following products were identified in the storage area as non-domestic and they were not being tracked on a noncompliant list:

- Canned tropical fruit salad - Thailand
- Canned mandarin oranges -China
- Fresh cucumbers - Mexico
- Fresh tomatoes - Mexico
- Fresh bell peppers - Mexico

CORRECTIVE ACTION: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in your food storage areas. Provide the completed list as corrective action. A template form is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

10. **FINDING:** Additional training is needed on the following topics for anyone involved with the preparation, service and/or determination of reimbursable meals:

[Offer vs. Serve](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html) (<https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html>)

[Product Formulation Statements](https://www.youtube.com/watch?v=59Em9r8QjU8&feature=youtu.be)

(<https://www.youtube.com/watch?v=59Em9r8QjU8&feature=youtu.be>)

[Production Records](https://media.dpi.wi.gov/school-nutrition/final-production-records/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/final-production-records/story_html5.html)

[Standardized Recipes](https://media.dpi.wi.gov/school-nutrition/whats-yield-with-standardized-recipes/story.html) (<https://media.dpi.wi.gov/school-nutrition/whats-yield-with-standardized-recipes/story.html>)

Webcasts are found on the [School Nutrition Team Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#) webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts#>).

CORRECTIVE ACTION REQUIRED: Watch the training webcasts and submit a training log with the date each webcast was viewed and signature of attendees.

SMART SNACKS

Comments/Technical Assistance

At the time of the on-site review there were no competitive foods or beverages sold at St. Charles School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant address financial topics with the Office Manager.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
 - Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under "Ala Carte", report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- **Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs.** [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- **USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf)** (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding:** The school has no written unpaid meal charge policy which was required to be in place and distributed to families by July 1, 2017.
Corrective Action Needed: Please develop a timeline for a written unpaid meal charge policy and distribution to households.

Paid Lunch Equity (PLE)

Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! **The SFA’s current weighted average for 2017-18 SY tool is \$2.65**
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.

- Refer to the [PLE 'In a Nutshell'](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf) for more information on the PLE tool (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ple-in-a-nutshell.pdf).
- Refer to the most recent [memo](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf) from DPI (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-032917.pdf).
- Refer to the most recent [guidance memo](https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf) from USDA (https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf).
- Step by step instructions to completing the PLE tool can be found on our [financial website](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) under Paid Lunch Equity (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)/Compliance Reminders

- **Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk** (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx).

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

- SFAs that sell **only** nonprogram milk and adult meals as nonprogram foods are **exempt** from completing the USDA Nonprogram Food Revenue tool (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf).

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf)
- [Nonprogram Foods In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf)

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- ❑ **Finding #1:** Second entrees are offered to students which are not part of the reimbursable and are considered nonprogram foods. Because of this, these entrée costs may not be absorbed by the non-profit food service account. Either the items need to be charged to the students at nonprogram food prices, or the items need to be tracked and a transfer of funds made from non-federal sources into the food service account for the full cost of items offered.

Corrective Action Needed: Please submit a plan as to how these nonprogram second entrée costs will be covered at St. Charles School for the 17-18 school year.

Indirect Costs

Comments/Technical Assistance (TA)/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).

However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

Civil Rights Training

- **Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.**

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Special Dietary Needs

- **All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement for Special Dietary Needs](#) posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)**
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** Menu boards and posted menus do not have the correct USDA Non Discrimination Statement. Also, full-size version of And Justice For All poster not posted in cafeteria and old versions of the And Justice For All poster are posted in front office and front entry of school.

Corrective Action Required:

- **Order new menu boards** and take picture and send to consultant. New menu boards can be ordered, at no charge, from the [Team Nutrition](https://docs.google.com/forms/d/e/1FAIpQLSc3VjFukdf0sw2-K81mxgjGsPK23H1_EMsqroLKctI-k6PBhg/viewform) website (https://docs.google.com/forms/d/e/1FAIpQLSc3VjFukdf0sw2-K81mxgjGsPK23H1_EMsqroLKctI-k6PBhg/viewform). The first page of information must be completed and then click 'next' at bottom of page to get to more order options.
- Correct menu NDS and **send a scan of the corrected statement on the menu** to consultant.
- New And Justice for All posters have been ordered for St. Charles. Please post when receive.

- ❑ **Finding #2:** One food service volunteer has not viewed civil rights training.

Corrective Action Required: Please have volunteer view the civil rights Powerpoint, **sign the sign-in sheet** and **scan copy of sheet** to consultant.

- ❑ **Finding #3:** Overt identification noted on the meal count sheets.

Corrective Action Needed: Remove identifying markings from the meal count roster. **Corrected on-site. No further action required.**

Local Wellness Policy

Comments/Technical Assistance (TA)/Compliance Reminders

Great work on participating the Wisconsin Obesity Prevention Initiative and receiving an evaluation of your policy from the initiative. The results show St. Charles is partially or fully addressing many of the

policy requirements. It also shows how your school compares to model policies in strength and breadth.

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding#1:** SFA LWP meets some but not all of the requirements as stipulated above:
- An official in charge of overseeing the LWP needs to be designated within the policy.
 - Language added regarding food and beverage marketing
 - Goal for other school-based strategies for wellness
 - Language for the required triennial assessment
 - Language for updating and informing the public
- Corrective Action Required:** Please provide a timeline for updating your policy to become compliant with the final rule.

Professional Standards

Comments/Technical Assistance (TA)/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff).

Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action: Professional Standards

- ❑ **Finding:** The Food Service Director was hired after July 1, 2015 and does not have the minimum education and/or school food service experience for this SFA.
Corrective Action Needed: Complete the Professional Standards Exemption form and submit to Karrie Isaacson at karrie.isaacson@dpi.wi.gov for review.
- ❑ **Finding:** Staff have not completed the required training hours for the current school year and were unable to provide a training plan for the current school year.
Corrective Action Needed: Provide a training plan for meeting the required training hours for the food service director and office staff (category 2 employee, requiring 4 hours annual training).
- ❑ **Finding:** Training is not being monitored on a tracking tool.
Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Food Safety and Storage

Comments/Technical Assistance (TA)/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Food Safety Plans

- **The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.**
- **All schools must have a comprehensive, site-specific food safety plan on-site** which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype

food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)

- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Food Employee Reporting Agreements

- **All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file** (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Time/Temperature Control for Safety (TCS) Food

| | |
|---|--|
| Milk and dairy products | Tofu or other soy protein |
| Shell eggs | Sprouts and seed sprouts |
| Meat (beef, pork, and lamb) | Sliced melons |
| Poultry | Cut tomatoes |
| Fish | Cut leafy greens |
| Shellfish and crustaceans | Untreated garlic-and-oil mixtures |
| Baked potatoes | Synthetic ingredients, such as textured soy protein in meat alternatives |
| Heat-treated plant food, such as cooked rice, beans, and vegetables | |

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Incomplete “Description of Program Overview and Facility.” Refer to page 56 of the [USDA Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp_may14_1.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp_may14_1.doc).

Corrective Action Needed: Update Description of Program Overview and Facility page of food safety plan with site-specific information. Submit updated page as an attachment to assigned DPI Nutrition Program Consultant via email.

- ❑ **Finding #2:** Missing Food Employee Reporting Agreements.
Corrective Action Needed: Complete all missing agreements. Submit copies of completed agreements as an attachment to assigned DPI Nutrition Program Consultant via email.
- ❑ **Finding #3:** Most recent food safety inspection report is not posted in a publicly visible location.
Corrective Action Needed: Completed on-site. No further action required.

Reporting and Recordkeeping

Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

Comments/Technical Assistance (TA)/Compliance Reminders

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

Breakfast Promotion

The breakfast participation at St. Charles is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (http://dpi.wi.gov/school-nutrition/school-breakfast-program).

A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](#) webpage, in

the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at St. Charles School, **USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months.** SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action: SBP and SFSP Outreach

Finding #1: No Summer Food Service Program Outreach was done to inform households of summer meal availability.

Corrective Action Needed: Please provide a statement that St. Charles will notify households of how to find the nearest Summer Foodservice Program using the [DPI program finder](#).

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure student success.

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



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